REMARKS

Claim 2 has been amended to correct a typographical error, claims 18 and 19 have been amended to overcome the Examiner's rejection under 35 USC § 112, and claim 26 has been amended as required by the Examiner to overcome his objection. No new subject matter has been added by the foregoing amendments.

The Examiner rejected claims 18 and 19 due to insufficient antecedent basis for "the generated function". Claim 18 has been amended to recite the limitation "a function stored in memory having the generated function name". This limitation was previously recited as part of the last limitation of the claim which now recites "performing the function". It is submitted that a person skilled in the art would appreciate that the term "the function" is the function associated with the generated function name that is stored in memory. Applicants trust that the Examiner agrees that there now is sufficient antecedent basis for the limitation in claim 18. Claim 19 is dependant upon claim 18. Applicants trust that the Examiner agrees that there now is sufficient antecedent basis for the limitation in claim 19. claim 19 has been amended for extra clarity to remove an instance of the word "of" and to correct antecedents.

The Examiner's rejection of claims 1 – 17, 20 – 21 and 25 –26 as anticipated by Macromedia, Extending Dreamweaver (http://www.adobe.com/support/dreamweaver/extend.html) ("Macromedia") under 35 U.S.C. 102(b), is in error. Applicants submit that the document cited by the Examiner does not relate to the subject matter of the instant claimed invention. Macromedia provides information about how to program Dreamweaver extensions and explains the Dreamweaver API. The cited document does not teach what these extensions can be used to accomplish. Rather, it describes various functionality that Dreamweaver supports and describes how to use this functionality to

enable one skilled in the art to add an extension in Dreamweaver. However, a person skilled in the art could use the teachings of the present application to create a new Dreamweaver extension that provides functionality to Dreamweaver not envisioned by the cited document. Furthermore, as outlined in the cited document, in particular on pages 31, 37, 5, 77 and 87, the extensions are created using HTML files and HTML forms. The invention as described and claimed, overcomes some of the problems associated with HTML outlined in the background section of the description.

Moreover, as mentioned above, the cited document describes the various features of Dreamweaver that allow a person skilled in the art to add extensions that add functionality to Dreamweaver. Applicant submits that the subject matter of current claims 1 – 17, 20 – 21 and 25 –26 is not anticipated by the cited document. The subject matter of the current patent application is directed towards systems and methods of controlling user interface features of a web application. The system and methods do not require Dreamweaver or the Dreamweaver API. The current application describes a way of specifying user interfaces in such a manner so as to allow for the separation of the display characteristics of the control elements from the function of the control elements. The graphical appearance of the user interface is described in an extensible markup language. In a particular embodiment, scalable vector graphics is the markup language used. The information disclosed by the Macromedia document does not disclose or suggest such systems or methods.

<u>Claim 1</u>

The Examiner has rejected independent claim 1, alleging that Macromedia teaches a system for controlling user interface features of a web application. As outlined above the

Macromedia document discloses information on adding extensions for Dreamweaver, not for controlling user interface features of a web application. Dreamweaver's support for extensions cannot be considered the same as controlling user interface features of a web application. Dreamweaver extensions may be used to add functionality to the Dreamweaver program. As outlined in the specification as originally filed, the systems and methods taught in the current patent disclosure can be used within web browsers, which differs from Dreamweaver.

The Examiner has alleged that the Macromedia document discloses a collection of user interface control elements. The Dreamweaver extensions listed in the Macromedia document are objects, commands, menu commands, panels, data translators, property inspectors, reports, and behaviors that a user can create using HTML and the Dreamweaver API. None of these listed extensions describe the control elements as described in the current application and claimed in the current independent claim 1. In addition to failing to disclose the control elements, Macromedia particularly fail to describe separating the functionality of an object, command, etc., from its display. This is evident, in particular, with floating panel extensions which are described as HTML files that use forms to gather user input. The floating panels receive their input from an HTML form. Although HTML allows for the specification of the location and size of various elements of a form, this is not the same as the as the control of the graphical appearance of elements as is understood in light of the description. The control of the graphical appearance that is achieved with the present patent disclosure allows for the specification of not just the size or position of the element but all of the graphical characteristics. There is no way of specifying the graphical appearance of the extensions of the Macromedia document.

The Examiner has further alleged that the use of CSS style functions taught by the Macromedia document discloses a skin reference attribute for referencing a skin template. As described in the current patent disclosure, skin templates are used to define the visual and graphical appearance of control elements. This allows for the absolute specification of the appearance of the user interface control using an extensible markup language. The CSS style functions disclosed in the Macromedia document do not allow for specifying the visual and graphical appearance of control elements. CSS style function are used to apply CSS styles to an HTML document or elements in the HTML document. They cannot define the visual and graphical appearance of control elements, as the control elements are not defined in HTML.

As outlined above the Macromedia document does not disclose the system for controlling user interface features of a web application as claimed in independent claim 1. As such applicant submits that the claimed subject matter of claim 1 is not anticipated by the Macromedia document and complies with 35 U.S.C. 102(b).

Claim 2

The Examiner has rejected dependent claim 2, alleging that Macromedia teaches the system for controlling user interface features of a web application. As outlined above, the Macromedia document does not disclose the subject matter of claim 1, which claim 2 depends on. Furthermore, the document fails to disclose the initialization function as claimed. The document describes methods that can be used for a tree control within Dreamweaver. It describes functions for manipulating the tree control content. This fails to disclose the initialization function as claimed and understood in light of the description as filed. The initialization function searches a document object model for control elements, and calls a

function based on the name of the control element found and a predetermined naming convention. The initialization function may be used to initialize the control elements. Although the initialization function makes use of the tree structure of a document object model, it does so in order to search for control elements. This cannot be considered as simply functions that the manipulate a tree control's content as described in the Macromedia document. As such, Applicant submits that the subject matter of claim 2 is not anticipated by the Macromedia document and complies with 35 U.S.C. 102(b).

Claims 3 to 13

The Examiner has rejected dependent claims 3 - 13, alleging that Macromedia teaches the system for controlling user interface features of a web application. As outlined above, the Macromedia document does not disclose the subject matter of claim 1. Claims 3 – 13, being either directly or indirectly dependent on claim 1, contain all of the limitations of claim 1, and serve to further limit the scope of the claim. As such, Applicant submits that the subject matter of claims 3 – 13 is not anticipated by the Macromedia document, and the claims comply with 35 U.S.C. 102(b).

Claim 14

The Examiner has rejected independent claim 14, alleging that Macromedia teaches the system for controlling user interface features of a web application. As outlined above for claim 1, the Macromedia document does not disclose the control elements as described. The document further fails to disclose associating instructions with control elements where the instructions are for performing actions associated with the control elements. As outlined above

for claim 2, the Macromedia document fails to describe the initialization function as claimed

and understood in light of the description as originally filed. As such, Applicant submits that

the subject matter of claim 14 is not anticipated by the Macromedia document, and complies

with 35 U.S.C. 102(b).

Claim 15

The Examiner has rejected dependent claim 15, alleging that Macromedia teaches the

system for controlling user interface features of a web application. As outlined above, the

Macromedia document does not disclose the subject matter of claim 14. Furthermore, as

previously described, the Macromedia document fails to disclose a collection of skin templates

as claimed, and understood in light of the description as originally filed. Claim 15, being

dependent on claim 14, contains all of the limitations of claim 14 and serves to further limit the

scope of the claim. As such, Applicant submits that the subject matter of claim 13 is not

anticipated by the Macromedia document, and complies with 35 U.S.C. 102(b).

Claim 16

The Examiner has rejected independent claim 16, alleging that Macromedia teaches the

method for controlling user interface features of a web application. As previously outlined the

Macromedia document discloses functions for manipulating the content of a tree control. It

does not disclose searching for a designated user interface control element in a document object

model. The Macromedia document further fails to disclose calling a script associated with the

designated control element. As previously outlined the Macromedia document does not

disclose control elements as understood in light of the description as originally filed. The

methods disclosed by the document for manipulating the tree control content are simply

common methods for working with tree structures. These methods do not disclose the claimed

subject matter of the independent claim 16 as understood in light of the description as

originally filed. As such, Applicant submits that the subject matter of claim 16 is not

anticipated by the Macromedia document, and complies with 35 U.S.C. 102(b).

Claims 17, 20 and 21

The Examiner has rejected dependent claims 17, 20 and 21, alleging that Macromedia

teaches the method for controlling user interface features of a web application. As outlined

above, the Macromedia document does not disclose the subject matter of claim 16. Claims 17,

20 and 21, being either directly or indirectly dependent on claim 16, contain all of the

limitations of claim 16 and serve to further limit the scope of the claim. As such, Applicant

submits that the subject matter of claims 17, 20 and 21 is not anticipated by the Macromedia

document, and the claims comply with 35 U.S.C. 102(b).

Claim 25

The Examiner has rejected independent claim 25, alleging that Macromedia teaches the

method for controlling user interface features of a web application. The Macromedia document

discloses functions for adding behaviors to an object. As previously outlined the document

does not disclose user interface control elements. Although the document discloses a function

for adding a behavior to an object, it does not disclose a method for controlling user interface

features of a web application. The document discloses a function for getting an action at a

specified position within the specified event. The function returns a string representing the

function call. This cannot be considered the same as receiving an event which is equal to an event attribute setting in the behavior element, and calling an associated script. As such, Applicant submits that the subject matter of claim 25 is not anticipated by the Macromedia document, and complies with 35 U.S.C. 102(b).

Claim 26

The Examiner has rejected independent claim 26, alleging that Macromedia teaches the method for controlling user interface features of a web application. As previously outlined the document fails to disclose user interface controls as understood in light of the disclosure as originally filed. As such, the document cannot describe a method having a step for categorizing the user interface controls into fundamental core controls. The Macromedia document also fails to disclose skin templates to allow for the absolute customization of appearance of the core control. As such, Applicant submits that the subject matter of claim 26 is not anticipated by the Macromedia document, and complies with 35 U.S.C. 102(b).

Turning now to the Examiner's rejection of claims 18 – 19 and 22 – 24 under 35 U.S.C. 103(a), alleging that the claims are unpatentable over Macromedia in view of Cain (US 6,014,138), the Examiner also is in error.

Cain teaches a development system and methods related to creating programs for storing, retrieving, and presenting information ion a data processing system, such as a Database Management System. Cain fails to disclose any information that one skilled in the art could apply to the Macromedia document to arrive at the claimed subject matter of the current application.

Claim 18

The Examiner has rejected claim 18, alleging that the subject matter would have been obvious to one skilled in the art having regard to Macromedia in view of Cain. Applicant submits that Cain does not disclose any information that one skilled in the art could use to overcome the deficiencies of the Macromedia document previously outlined for claim 16, which claim 18 depends. Furthermore, Cain does not teach dynamically generating a function name associated with the designated element as alleged by the Examiner. Cain teaches automatically assigning a generic name. This is not the same as dynamically generating a function name associated with the designated element. Cain further fails to disclose passing an object associated with the designated element as a parameter of the generated function. Instead Cain teaches passing a string to the function. The string is not associated with the designated object. Applicant submits that claim 18 contains patentable subject matter over the Macromedia document in view of Cain, and complies with 35 U.S.C. 103(a).

Claim 19

The Examiner has rejected dependent claim 19, alleging that that the subject matter would have been obvious to one skilled in the art with regard to the Macromedia document in view of Cain. As outlined above for claim 18, which claim 19 depends, Cain fails to disclose any information that would lead one skilled in the art to the subject matter of the claim. As such, Applicant submits that claim 19, comprising the limitations of claim 18, contains patentable subject matter over the Macromedia document in view of Cain, and complies with 35 U.S.C. 103(a).

Claim 22

The Examiner has rejected dependent claim 22, alleging that that the subject matter would have been obvious to one skilled in the art with regard to the Macromedia document in view of Cain. As outlined above, Cain fails to disclose information that one skilled in the art could apply to the Macromedia document to arrive at the claimed subject matter. Cain particularly fails to disclose generating a function name comprising the name of the designated attribute and assigning an object associated with the designated attribute as the parameter of the function name. As such, Applicant submits that claim 22 contains patentable subject matter over the Macromedia document in view of Cain, and complies with 35 U.S.C. 103(a).

Claim 23

The Examiner has rejected dependent claim 23, alleging that that the subject matter would have been obvious to one skilled in the art with regard to the Macromedia document in view of Cain. As outlined above, Cain fails to disclose information that one skilled in the art could apply to the Macromedia document to arrive at the claimed subject matter. Cain particularly fails to disclose dynamically generating a function name associated with the designated attribute and passing an object associated with the designated attribute as a parameter of the generated function name. As such, Applicant submits that claim 23 contains patentable subject matter over the Macromedia document in view of Cain, and complies with 35 U.S.C. 103(a).
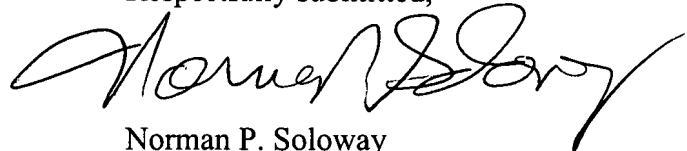
Claim 24

The Examiner has rejected dependent claim 24, alleging that that the subject matter would have been obvious to one skilled in the art with regard to the Macromedia document in view of Cain. As outlined above, Cain fails to disclose information that one skilled in the art could apply to the Macromedia document to arrive at the claimed subject matter. Cain particularly fails to disclose generating a function name comprising the name of the designated attribute and assigning an object associated with the designated attribute as the parameter of the function. As such, Applicant submits that claim 24 contains patentable subject matter over the Macromedia document in view of Cain, and complies with 35 U.S.C. 103(a).

Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action are respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,

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